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GPT/BNSF Custer Spur EIA Co-Lead Agencies
c/o CH2MHill
1100 112th Avenue Northeast, Suite 400
Bellevue, WA 98004

January 21, 2013

**RE: Scoping Comment on need for comprehensive and cumulative health impact assessment from coal mines to coal transport facilities.**

Dear Co-Lead Agencies' Representatives Ms. Kelly (DOE), Mr. Perry (USACE), and Mr. Schroeder (Whatcom County):

For 8 years I visited Orcas Island before moving here to live full time nearly three years ago with my family. I am a mother, a wife, business owner, and a co-founder of the Orcas NO COALition—a nonpartisan group of Orcas Island residents committed to informing our island community about the proposed Gateway Pacific Terminal at Cherry Point. For 25 years I have worked in science policy and education, work that involves bringing researchers and peer-reviewed science and technical knowledge to public policy discussions.

The proposed Gateway Pacific Terminal, GPT, would be located 10 nautical miles across Georgia Strait from our home, from which we can already see the large number of oil tankers coming and going from oil and tar sands oil refineries near Neptune Beach.

GPT is the largest of five proposed coal transport terminals in Washington and Oregon. Others include Millennium Bulk Logistics (Longview, WA), Port Westward Morrow Pacific Project (Boardman, OR), Port Westward Project (Port of St. Helens, OR), and Port of Coos Bay "Project Mainstay" (Coos Bay, OR). At full capacity, these terminals could export as much as 150 million tons of coal annually, resulting in 50 or more full and empty trains per day through scores of communities from coal pits in Montana and Wyoming to coal ports in Washington and Oregon, each up to 1.5 miles or more in length. At full build out, GPT alone would transport 48 million tons of coal per year, making it the largest coal transport facility in North America. The impacts of this coal transport would be felt in a wide range of rural, suburban, and urban communities along especially, but not limited to the rail route from Longview, WA to Cherry Point, WA.

Each terminal is required to undergo an environmental assessment to comply with the National Environmental Protection Act (NEPA). However, there is no clear mechanism to assess and mitigate the *cumulative* impacts of multiple regional terminals and associated train traffic, particularly their potential impacts on the health of all significantly impacted communities.

Terminal proponents argue that the coal terminals could bring economic benefits to the region—new employment, tax revenues, and investor profits—at a time when economic benefits are needed. While these benefits could have some positive health impacts for some portion of the regional population, the terminals and coal transportation could also have substantial negative impacts on human health and quality of life both in port communities and in scores of large and small communities along the coal train route. It is likely that negative impacts would be borne by people and communities who would share the costs of transporting coal, but who would not share the benefits (corporate profits or jobs).

Some of the readily predictable, **direct** consequences with adverse health impacts include:

- air pollution caused by diesel emissions and coal dust (see the detailed GPT EIS scoping comment # 6641 submitted by UCLA Professor Emeritus Arthur Winer calling for specific studies related to air pollution)

- noise and vibrations from trains and crossing signals, day and night (see the nearly 3000 GPT EIS scoping comments as of January 21 related to noise)
- street traffic congestion resulting in vehicle and pedestrian hazards, stressed and divided communities, delays in emergency response, and restricted trucking (see the nearly 4000 GPT EIS scoping comments as of January 21 related to traffic)
- a higher probability of train derailment from straining a near-capacity system (see the hundreds of GPT EIS scoping comments as of January 21 expressing concern about derailments, mudslides, and similar disruptive events)

**Indirect** consequences could also pose substantial risks for health and quality of life. Local communities might be compelled to shift expenditures from health and human services and other health promoting public expenditures to absorb costs of accommodating rail traffic; for example, building vehicle and pedestrian overpasses. The increased emissions, noise and traffic congestion could reduce nearby property values, disrupt the local business environment, decrease tourism, and interfere with other rail or truck transport, resulting in losses of quality of life, personal income, tax base, and government revenues.

At a global level, greenhouse gas emissions from combustion of exported thermal coal by inefficient furnaces in rapidly industrializing countries could substantially contribute to climate change and negatively impact local health. Recent events in China, where much of the coal will end up, drive this point home: In the first weeks of January 2013, airborne particulate matter vastly exceeded the World Health Organization's guidelines of no more than 25 micrograms per cubic meter. Readings over 400 In light of the potential for significant adverse health impacts along the entire rail route from coal mines in the Power River Basis to coal export terminals in the Pacific Northwest, I request that a comprehensive, cumulative **health impact assessment** (HIA) be conducted for the entire route, from pits to ports. The National Research Council's definition of HIA is

> "…a systematic process that uses an array of data sources and analytic methods and considers input from stakeholders to determine the potential effects of a proposed policy, plan, program, or project on the health of a population and the distribution of the effects within the population. HIA provides recommendations on monitoring and managing those effects. "[1]

An objective HIA is needed in order to provide a sound evidence base for decisions related to development of regional coal export operations. And, in order for the HIA to fully inform the agencies' decision-making process, it must be conducted in tandem with the EIS. The HIA should be designed to be both comprehensive and cumulative: *comprehensive* by examining all related activity, including coal transportation from mine to port, and potential impacts on climate change from burning coal shipped to Asian markets; and *cumulative* by adding up the incremental impacts of each potential port in Washington and Oregon, enabling a more accurate understanding of total potential impacts.

The HIA must be an objective analysis, conducted with appropriate expertise in health impact assessment project management, stakeholder engagement, transportation and land use planning policies and practices, energy economics, environmental and occupational medicine and epidemiology, and spatial analysis and mapping. The HIA should also identify mitigations for identified negative impacts, if such mitigations can be identified.

Thank you for considering this request.

Donna Riordan

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1. Committee on Health Impact Assessment, National Research Council. *Improving Health in the United States: The Role of Health Impact Assessment*. Wash, DC: National Academies Press; 2011.